

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

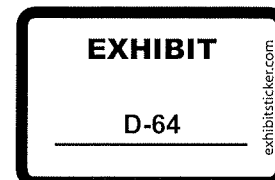
SIMON CAMPBELL, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	CIVIL ACTION
	:	
v.	:	NO. 18-CV-892-JD
	:	
PENNSYLVANIA SCHOOL BOARDS	:	JURY TRIAL DEMANDED
ASSOCIATION, <i>et al.</i>	:	
	:	
Defendants.	:	

PLAINTIFFS' RULE 26(A)(1) INITIAL DISCLOSURES

Plaintiffs, Simon Campbell ("Campbell") and Pennsylvanians for Union Reform ("PFUR"), by and through their undersigned counsel, provide the following as their Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

INTRODUCTION

1. The Initial Disclosures represent a good faith effort by Plaintiffs to identify available information that is reasonably available and supportive of their claims as required by Rule 26(a)(1).
2. Plaintiffs reserve the right to amend, correct, or supplement the Initial Disclosures at any time as permitted by Rule 26(e).
3. Plaintiffs do not represent that they are identifying or producing every tangible document, electronic document, or witness that may be relied upon to support their claims.
4. Plaintiffs make the Initial Disclosures without waiving any applicable privilege or work product protection.
5. Plaintiffs reserve the right to object to the use of the information and documents referenced in the Initial Disclosures for any reason, both in this case and in any other proceeding.



6. Plaintiffs make no representations regarding the relevance, authenticity, or admissibility of any of the information or documents referenced in the Initial Disclosures.

INITIAL DISCLOSURES

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

	<u>INDIVIDUAL</u>	<u>SUBJECT INFORMATION</u>
1.	Simon Campbell c/o Gordon & Rees, LLP One Commerce Square 2005 Market St., 29th Fl. Philadelphia, PA 19103 (215) 561-2300	Facts described in the Complaint; facts supporting Plaintiffs' First Amendment retaliation claims; facts supporting injunctive relief; facts supporting compensatory and punitive damages.
2.	Representative(s) of Pennsylvanians for Union Reform c/o Gordon & Rees, LLP One Commerce Square 2005 Market St., 29th Fl. Philadelphia, PA 19103 (215) 561-2300	See above.
3.	Representative(s) of the Pennsylvania School Board Association c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	Facts described in the complaint; facts regarding PSBA attempt to influence processing of Plaintiffs' Right to Know Law requests; PSBA decision to initiate SLAPP Suit; facts supporting Plaintiffs' First Amendment retaliation claims; facts supporting injunctive relief; facts supporting compensatory and punitive damages.
4.	Michael Faccinetto c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
5.	David Hutchinson c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
6.	Otto W. Voit, III c/o Michael Levin 1800 Byberry Road, Ste. 1301	See above.

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7.	Kathy Swope c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
8.	Lawrence Feinberg c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
9.	Eric Wolfgang c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
10.	Daniel O'Keefe c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
10.	Darryl Schafer c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
11.	Thomas Kerek c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
12.	Lynn Foltz c/o Michael Levin 1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	See above.
13.	Emily Leader 400 Bent Creek Blvd. Mechanicsburg, PA 17050 (717) 506-2450	See above.
14.	Stuart Knade 400 Bent Creek Blvd. Mechanicsburg, PA 17050 (717) 506-2450	See above.
15.	Michael Levin	See above.

	1800 Byberry Road, Ste. 1301 Huntingdon Valley, PA 19006 (215) 938-6378	
16.	Nathan Mains 400 Bent Creek Blvd. Mechanicsburg, PA 17050 (717) 506-2450	See above.
17.	Representative(s) of the Shanksville-Stony Creek School District 1325 Cornerstone Rd. Friedens, PA 15541	See above.
18.	Representative(s) of PSBA member organizations, including but not limited to, public school districts, community colleges, Intermediate Units, and technical schools, etc.	See above.
19.	All representatives and individuals identified by other parties in their respective disclosures.	See above.
20.	Any other individuals with knowledge relevant to Plaintiffs' claims and damages, as identified during the course of discovery.	See above.

- B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

The following documents are in the possession, custody or control of Campbell and/or PFUR and may be used to support their claims or defenses:

	<u>DOCUMENT CATEGORY</u>	<u>LOCATION</u>
1.	Plaintiffs' Complaint	Docket
2.	Exhibits 1 through 15 attached to Plaintiffs' Complaint	Docket
3.	Current contents of www.paunionreform.org and www.psbahorror.com	Publicly available online
4.	Former contents of www.paunionreform.org and www.psbahorror.com	Gordon & Rees, LLP One Commerce Square 2005 Market St., 29th Fl. Philadelphia, PA 19103 (215) 561-2300
5.	All relevant documents within the possession of Defendants, including but not limited to,	Michael Levin 1800 Byberry Road, Ste. 1301

	documents exchanged during discovery.	Huntingdon Valley, PA 19006 (215) 938-6378
6.	All documents produced during discovery in this litigation.	Gordon & Rees, LLP One Commerce Square 2005 Market St., 29th Fl. Philadelphia, PA 19103 (215) 561-2300
7.	Documents obtained from third-parties via subpoena in this action or in the SLAPP Suit.	To be determined.

- C. A computation of any category of damages claimed by the disclosing party, providing for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

	CATEGORY OF DAMAGES	COMPUTATION
1.	Injunctive relief	Non-monetary damages.
2.	Compensatory damages	Amount to be determined by a jury as sufficient to compensate Plaintiffs for damage caused by defendants' constitutional violations in filing and prosecuting the SLAPP Suit, including without limitations the costs to defend the SLAPP Suit, which continue to accrue as PSBA continues its prosecution of the SLAPP Suit, as well as the appropriate compensation for the intimidation and distress visited upon Plaintiffs by defendants' unlawful actions. Documentation supporting the ultimate amounts claimed for the expense of defending against the SLAPP Suit will be produced at an appropriate future time after associated privilege, work product, and confidentiality issues have been satisfactorily addressed.
3.	Exemplary/Punitive damages	An amount to be determined by a jury as sufficient to punish Defendants and deter them and others from engaging in unconstitutional and tortious conduct in the future.
4.	Attorneys' fees and recoverable costs	An amount to be determined at the conclusion of this litigation based upon the total legal fees and costs incurred by Plaintiffs in connection with this action.

- D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to Plaintiffs.

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Dated: March 9, 2018